

ATTACHMENT A

STIPULATION OF FACTS: United States v. Zhi Tian Lang

The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

Between at least January 2014 and October 2014, **ZHI TIAN LANG** (“**LANG**”) communicated through means and facilities of interstate commerce, including through the KIK internet application (among others), with various minor females (victims) who were located outside the state of Maryland. At all relevant times, **LANG** was located in and a resident of Maryland.

LANG used the alter ego of “Seth” or “Seth N.” and the KIK username “sethnaz96” when contacting victims. **LANG** would obtain pictures of minor victims from their social media accounts or through direct flirtation. The pictures often depicted the minors in their underwear. He would then demand that unless a victim provided him with nude pictures, he would post the initial risqué pictures on a public internet account or send them directly to one or more of the victim’s acquaintances. Based on complaints by victims, independent investigations by both state and local law enforcement were begun in multiple jurisdictions, including South Dakota, Wisconsin, and New Jersey. Ultimately, victims in numerous other states were identified and interviewed by law enforcement.

Following an investigative lead from a reporting victim in another jurisdiction, on October 27, 2014, Maryland law enforcement contacted and conducted an interview of **LANG** at his residence in Gaithersburg, Maryland. **LANG** admitted that he had contacted minors using KIK and had nude pictures of minors on his electronic devices. Law enforcement seized the electronic devices that contained contraband, including a Samsung Galaxy Note II cellular telephone containing a SanDisk 32GB Micro SDHC Memory Card, a Lenovo brand laptop computer with serial number EB33129955, and a Western Digital external hard drive with serial number WX21A3353027. Pursuant to a search warrant issued in the District of South Dakota, **LANG**’s devices were searched and numerous images and videos depicting child pornography were identified. Some of the images recovered from **LANG**’s telephone were organized into folders containing child pornography with folder names matching and images depicting victims described below.

The following paragraphs describe **LANG**’s interactions with certain minor victims. **LANG** contacted each of these victims through the KIK internet application. At times, the victims referred to **LANG** as “Seth.”

Beginning in August 2014 and continuing into September 2014, **LANG** contacted Victim 1 when she was 13 years old. **LANG** knew Victim 1 was a minor. Victim 1 initially sent **LANG** pictures of herself in bikini underwear. On September 18, 2014, **LANG** threatened to post images of Victim 1 on her Instagram account unless she sent him sexually explicit pictures and videos.

LANG's directions to Victim 1 included the following: "Pussy," "Spread," "Make daddy a video," "Play with your body and look in the camera," "And say you love daddy and love being his little slut," "And want my cock more than anything," "Then play with your body and pussy." Victim 1 told her mother that she was being extorted. Victim 1's mother confronted **LANG** via KIK, telling him that "I am her mother and if you don't stop I will contact the police." Among other things, **LANG** replied: "Nope you can involve them but your daughter will still be ruined if you do" and "Let your daughter talk to me and I'll negotiate. Thats it." Victim 1's local police department conducted an independent investigation that identified communication from the "Seth N." KIK account as originating from the IP address of **LANG's** residence in Gaithersburg, Maryland. The exchanges (including images) between **LANG** and Victim 1 were recovered from an electronic device belonging to Victim 1.

In or about September and October 2014, **LANG** contacted Victim 2 when she was 14 or 15 years old. **LANG** used images of Victim 2 in bras and panties as leverage to have her produce more explicit photos. When Victim 2 resisted, **LANG** would post some of the pictures he already had of her on Instagram. Victim 2 sent **LANG** pictures of her vagina, including showing objects inserted into her vagina. Victim 2 also sent a picture of herself crying to **LANG**.

In or about October 2014, **LANG** communicated with Victim 3 when she was 14 and 15 years old. **LANG** used images of Victim 3 topless to threaten her to produce more explicit photos. For example, on October 21, 2014, **LANG** told Victim 3: "Send me nudes or else I'll post yours online." Victim 3 resisted and ultimately did not provide any photos depicting herself fully nude.

In or about September 2014, **LANG** communicated with Victim 4 when she was 14 years old. **LANG** threatened Victim 4 that if she did not send more pictures that he would send the pictures he already had to her friends that he had identified. At **LANG's** direction, Victim 4 sent **LANG** nude pictures of herself, including pictures of her vagina and masturbation.

On August 31, 2014 and earlier, **LANG** communicated with Victim 5 when she was 15 years old. Victim 5 initially sent **LANG** naked photographs of herself willingly. **LANG** sent Victim 5 threatening messages to get her to send additional photographs. Victim 5 felt she had no choice but to send additional photographs, including multiple videos depicting masturbation as well as depictions of vaginal and anal penetration with objects. Victim 5 sent **LANG** a picture depicting herself with the words "Seth's Little Slut" written on her belly.

On or about September 24, 2014, **LANG** communicated with Victim 6 when she was 13 years old. **LANG** threatened to send pictures of Victim 6 to an acquaintance of hers, and others, unless she made a sexually explicit video. In particular, on September 24, 2014, he told her: "Have fun with everyone in the world seeing your nudes" as a threat to induce her to send a sexually explicit video. Immediately after Victim 6 told **LANG** she was 13, **LANG** wrote back, "Posting tonight!"

In at least September and October 2014, **LANG** communicated with Victim 7 when she was 15 years old. Victim 7 provided nude pictures to **LANG**. **LANG** became abusive and demanding and asked for more nude pictures: "Unless you send me pics m I'll send all your pics out." Victim 7 sent two pictures of her pubic area and additional pictures of her breasts.

In at least September and October 2014, **LANG** communicated with Victim 8 when she was 16 years old. Victim 8 produced nude images of herself, including images and videos depicting her vagina, anus, and acts of masturbation, at **LANG**'s request.

In at least September and October 2014, **LANG** communicated with Victim 9 when she was 14 years old. Victim 9 initially took pictures of herself wearing underwear. After he demanded more, the pictures she made and sent to him were nude, including a picture of her vaginal area.

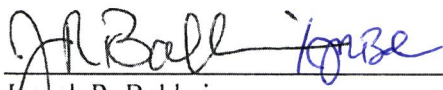
Beginning in July 2014 and continuing through at least October 2014, **LANG** communicated with Victim 10 through a variety of internet applications (including Instagram, KIK, and Skype) when she was 14 years old. **LANG** threatened to send photographs of Victim 10 to an adult who knew her. **LANG** made Victim 10 send photos of herself bending over so that he could see her pubic area and also send videos depicting other sexually explicit conduct, including digital penetration. In addition, Victim 10 sent **LANG** pictures of herself crying.

In or about August and September 2014, **LANG**, using the name "Seth," communicated with Victim 11 when she was 17 years old. **LANG** captured images of Victim 11 in her underwear that she had previously posted to her Instagram account. **LANG** threatened to send the underwear images to Victim 11's family unless Victim 11 provided nude photographs. Ultimately, Victim 11 sent **LANG** nude photographs, including photographs depicting her vagina. **LANG** sent at least one of the nude photographs to another individual.

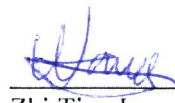
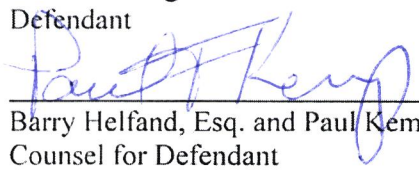
Using internet communication applications, **LANG** knowingly persuaded or coerced (or attempted to persuade or coerce) minors to send him photographs and videos in which the minors were depicted engaging in sexually explicit conduct including masturbation and lascivious exhibition of their genitals or pubic area. **LANG** threatened minors, including for example Victim 1, that he would post revealing pictures of the minors on internet platforms to induce the minors to send him pictures and videos depicting sexually explicit conduct. **LANG** did in fact post photographs of minor victims to coerce them.

From the electronic devices seized from **LANG** on October 27, 2014, law enforcement recovered photographs of numerous minor victims, including all of the victims identified above, engaged in sexually explicit conduct. The communications between **LANG** and the minor victims, including Victim 1, moved in interstate commerce over the Internet.

SO STIPULATED:


Joseph R. Baldwin
Assistant United States Attorney

9/19/19


Zhi Tian Lang
Defendant

Barry Helfand, Esq. and Paul Kemp, Esq.
Counsel for Defendant